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*Lumbee Tribe Holdings, Inc.*  
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10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE DISTRICT OF NEVADA**

12 SAEID SAM KANGARLOU,

13 Plaintiffs,

14 v.

15 ALTON AL LOCKLEAR; LUMBEE LAND  
16 DEVELOPMENT, INC.; LUMBEE TRIBE  
HOLDINGS, INC.

17 Defendants.  
18  
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CASE NO.: 2:18-CV-02286-JAD-NJK

**JOINT STIPULATION AND  
ORDER FOR DISMISSAL OF  
PLAINTIFF'S COMPLAINT AND  
ALL AMENDMENTS THERETO,  
WITH PREJUDICE**

ECF No. 120

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21 Plaintiff, SAEID SAM KANGARLOU (hereinafter "Plaintiff"), by and through his  
22 attorney, Marc C. Naron, Esq. of the law firm D.R. PATTI & ASSOCIATES; Defendant, ALTON  
23 AL LOCKLEAR (hereinafter "Locklear", by and through his attorney, Mark Albright, Esq. and  
24 Daniel Ormsby, Esq. of the law firm Albright Stoddard Warnick & Albright; and Defendants,  
25 LUMBEE LAND DEVELOPMENT, INC. and LUMBEE TRIBE HOLDINGS, INC. collectively  
26 hereinafter "Lumbee"), by and through their attorney, Jennifer A. DelCarmen, Esq. of the law firm  
27 Resnick & Louis, P.C.; (hereinafter Plaintiff, Locklear, and Lumbee collectively the "Parties"),  
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1 hereby submit this Joint Stipulation to dismiss with prejudice all claims pending in the above  
2 litigation pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

3 The Parties hereby stipulate and agree to the dismissal of this action in its entirety, with  
4 prejudice, and each party to bear its own costs and attorneys' fees, subject only to the terms and  
5 conditions of the Parties' settlement agreement and release.

6 The Parties agree that none of them is a prevailing party in this action and therefore none  
7 of the Parties will seek any attorneys' fees or costs pursuant to any rule, statute, or law, whether  
8 local, state, or federal.

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IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 3<sup>rd</sup> day of January 2024.

**D.R. PATTI & ASSOCIATES**

*/s/ Marc Naron*

*/s/*

**MARC C. NARON, ESQ.**

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*Attorneys for Plaintiff*

*Saeid Sam Kangarlou*

DATED this 13<sup>th</sup> day of December 2023.

**ALBRIGHT STODDARD WARNICK &  
ALBRIGHT**

*/s/ Daniel Ormsby*

*/s/*

**G. MARK ALBRIGHT, ESQ.**

Nevada Bar No. 1394

**DANIEL R. ORMSBY, ESQ.**

Nevada Bar No. 14595

801 South Rancho Dr., Ste. D4

Las Vegas, NV 89106

*Attorneys for Defendant*

*Alton Al Locklear*

DATED this 3<sup>rd</sup> day of January 2024.

**RESNICK & LOUIS, P.C.**

*/s/ Jennifer DelCarmen*

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*Attorneys for Defendants*

*Lumbee Land Development, Inc., &*

*Lumbee Tribe Holdings, Inc.*

### ORDER

Based on the parties' stipulation [ECF No. 120] and good cause appearing, IT IS  
HEREBY ORDERED that **THIS CASE IS DISMISSED** with prejudice, each side to bear  
its own fees and costs. The Clerk of Court is directed to **CLOSE THIS CASE.**

  
U.S. District Judge Jennifer A. Dorsey

Dated: January 4, 2024